

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 1:21-bk-00418 HWV
KASEY J. KIRK	:	
Debtor	:	CHAPTER 13

**SECOND MOTION FOR EXTENSION OF TIME TO FILE
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN**

AND NOW comes Debtor, Kasey J. Kirk, by and through his attorney, Gary J.

Imblum, and respectfully represents:

- 1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on March 2, 2021.**

- 2. Debtor filed the bankruptcy as an emergency filing due to pending lawsuits and a hearing scheduled for March 3, 2021.**

- 3. Debtor's counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing. More specifically, Debtor is working to prepare and file his past due tax returns so that the refund/amount owed can be adequately accounted for, provide bank statements, and obtain the address of a person that he sold a vehicle to so same can be listed as a transfer of asset.**

4. Debtor filed a First Motion for Extension on March 17, 2021 which was approved by Order dated March 22, 2021.

5. Debtor's schedules are due to the Court on or before April 16, 2021.

6. It is estimated that Debtor's counsel will need an additional 30 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until May 16, 2021.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Attorney for Debtor

Dated: April 16, 2021

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.



Bernadette A. Davis, Paralegal
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Email: gary.imblum@imblumlaw.com

Dated: April 16, 2021

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IN RE: : **CASE NO. 1:21-bk-00418 HWV**
KASEY J. KIRK :
Debtor : **CHAPTER 13**

ORDER

Upon consideration of Debtor's Second Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

**IT IS HEREBY ORDERED AND DECREED that the deadline for filing the
aforementioned pleadings in the above captioned case is extended through May 16, 2021.**